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August 21, 2018

BY ECF

Honorable Richard J. Sullivan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Michael Underwood v. TAFSC Housing Development Fund
Corporation et. al
18 Civ. 06664 (RJS)

Dear Judge Sullivan:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for Defendant City of New York in the above-referenced alleged action. I write to respectfully request an extension of time to respond to the Amended Complaint.

I am requesting 45 days after the date a response to the Complaint would otherwise be due, from August 23, 2018 to October 5, 2018. Plaintiff has consented to extend the date only until September 6, 2018, which is just over two weeks away. Defendant New York State Homeless Housing and Assistance Corporation ("NYSHHAC"), who recently received an extension until September 6, consents to City Defendant's request. NYSHHAC asked me to inform the Court that it would like a concomitant extension in the interest of uniformity, but regardless of whether that is granted, consents to the City's request for the October 5, 2018 date.¹

Defendant City respectfully asserts that it needs until October 5, 2018, because I was only recently assigned this matter and additional time is necessary in order to allow this Office to review and investigate the factual allegations. In particular, Defendant City needs to investigate whether an employee/employer relationship even exists between Plaintiff and Defendant City, and to formulate an appropriate response to the Complaint.

¹ No notices of appearance have been filed for named defendants TAFSC Housing Development Fund Corporation, The Third Avenue Family Service Center, Inc., or Linda Washington and thus Defendant City has been unable to request their consent.

Thank you for your consideration of this request.

Respectfully submitted,

/s/Elizabeth H. Robins

Elizabeth H. Robins
Assistant Corporation Counsel

BY ECF

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